



March 24, 2008

TO: FCC

FR: Sylvia Drain, Market Manager – Bozeman, MT

RE: Localism

Dear Commissioners:

Here in small market America, radio stations are an integral part of the fiber of our communities and always have been. I will say right now this is a long letter because I have so much to say on this subject. It's an emotional letter because I take local radio very personally and I believe we do our jobs as it pertains to providing local radio very well here in Montana.

I manage five music stations and one news/talk. We have a part-time news director with plans to add a full-time news director... because WE want to increase our commitment to news coverage now that our community is large enough to warrant the expense. With the exception of our news/talk station, we utilize minimal satellite programming and then usually only on weekends. Our news/talk is live M-F from 6-10am and the host interviews local government officials, non-profit organizations, theater groups, local authors, etc. We added a local program "Open Range from 4-6 pm each day to expand upon the station's efforts to provide local content. Saturdays and a Sunday morning program are locally produced, as well. AM 1450 makes a point to interview all political candidates and will host a series of debates again this election year.

Our music stations are programmed locally and make every effort to contain local news, sports, traffic and community service information important to our listeners. We utilize voice tracked shifts to stretch our budgets but have made a commitment to use local talent so that we can provide the best local information possible and have personnel available for community events. This not only keeps our costs in line... in a community our size it allows a part-time person to carry more hours by being on more than one station. Each music station has live hours to take requests in addition to utilizing computerized voice-mail and e-mail for ensuring we are playing what the listeners want to hear.

Our stations carry Montana State University sports and one of our AMs, KPRK, carries Park High sports. We update the community on high school tournament play, invite players from the local junior hockey team in for interviews and our country station supports every community rodeo in our area... there is at least one rodeo every weekend during the summer months.

In addition to the local PSAs we air, each station airs a community calendar that covers local events. We carry public service programming, the "Gallatin Report", on Sunday mornings, a program highlighting timely interviews from our news/talk the prior week. Our music stations bring people from the community on their morning shows to showcase their events or fundraising efforts. We sponsor many non-profit events in our area and our personalities are often the MCs at these events.

Most of our staff is involved in one or more local organizations ranging from coaching little league baseball to mentoring students to being supporters of the arts. Our station group is a member of three area Chambers of Commerce (each of our cities of license), the Museum of the Rockies, the Southwest Montana Building Industry Association, and more. We are very involved with the local university... Montana State University. I, personally, sit on the Greater Gallatin United Way board of directors as well as that of the Safe Kids/Safe Communities Coalition, the Hwy. 191 Project and the Worthy Student Scholarship board at Bozeman High School.

Through my work with SK/SC, I have developed a close working relationship with law enforcement and fire protection officials and as a result we are involved in county-wide disaster planning offering our resources to inform the community at times when information is most needed. We are able to assist in this planning effort even though we do not operate live 24/7. We have a chain of contacts that allows us to be called at any time and technology offers us the opportunity to break into regular programming from remote points. This is a cost-effective solution to the issue of breaking emergency news and quite frankly I would rather have our operations manager who lives a block from the station respond in a true emergency than a kid I might pay minimum wage to "man the station" overnight. It would cost us a minimum of \$45,000 to staff overnights and weekends at just one of our locations at \$10 an hour. And, we have two studio locations to cover. I don't have that kind of margin to work with.

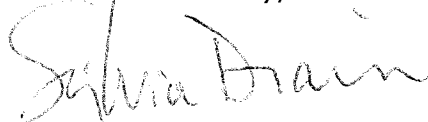
Of the six stations we operate, three are licensed to Bozeman, one to Belgrade and two to Livingston. We have maintained a studio in Livingston for KPRK AM, but the other two stations operate out of our Bozeman facility. If we didn't own the building KPRK operates from, it would be cost prohibitive to maintain studios and staff at that separate location. We program each station keeping in mind our commitment to the city of license and make certain that each station supports community events in that locale.

As technology continues to become available, we are more able to respond to the interests of our listeners. We get a better picture of who they are and what their likes and dislikes are. And, we are better able to respond. Our websites make it easy for people to contact us at any time. Our websites also give us another avenue for publicizing community events as each of our stations has a Community Events page. In addition, I take every phone call whether it is a complaint or compliment and respond to every e-mail or letter that has a return address.

The extra costs in manpower and record-keeping to comply with the proposed rules would keep us from being profitable at all. We operate as lean as possible while still providing the best local service possible in a small market where the qualified personnel pool is quite a bit smaller. No one makes us do what we do in our communities and yet we are constantly looking to do more, because we love having that connection to our listeners and what is important to them. This is why we work in radio.

In short, if I wasn't as tied into our communities as I am through our stations, I would not enjoy my job nearly as much. I am extremely proud of the high level of commitment to the communities our station group serves. The proposed localism rules will squash the feeling one gets when one makes a positive community impact... because nothing squashes spirit more than the word mandatory.

Most sincerely,



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Market Manager

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I am including a few excerpts from e-mails and notes from area non-profits here...

"I hope you or someone from your staff can join us for part of the day on Saturday. Thank you for your continued support. Creatively yours," Heather G. – Montana DestinNation Imagination

"Dropping a quick line to say how awesome it is that you're promoting the Juvenile Diabetes Walk this weekend... just wanted to say keep up the good work for great causes!... keeping the community spirit stoked in Bozeman..." John D.

re: GVL – Make Tracks for Trails/Ski-a-thon... "An interesting thing happened yesterday. A woman from the Patagonia store in Dillon called; she had heard about the event on the MOOSE and wanted to donate a ton of Patagonia gear for us to giveaway. Thanks for the great publicity! Sara A, Gallatin Valley Land Trust

"I just wanted to write and let you know that because of your efforts on the radio we have had over 20 applicants for the CAP program tell us they heard it on the radio and came to apply! We can thank you enough for what you do for our program! The radio is such a good way to get the word out and we appreciate you always taking the time to mention us and talk up the program!!! YOU ROCK! And we love you. Vanessa S. – Thrive – CAP Mentor Project

"On behalf of everyone at Bozeman Deaconess Hospital, I would like to thank you for your very generous donation of radio advertising for our Docs and Crocs and Hospitality 2008 events. We appreciate this opportunity to partner with you and, once again, express our sincere gratitude for your very generous assistance. We are honored to include you among our elite group of donors." Gratefully yours, Debra G., Bozeman Deaconess Foundation

"MY 103.5 has been one of the Museum's most steadfast supporters. We are delighted to have you on board for another Spooktacular!" Laura P. – Children's Museum of Bozeman

... there are many, many more because we take our responsibility to our community very seriously.